

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BBC STUDIOS DISTRIBUTION LTD,

Plaintiff,

v.

BLUFOREST INTERNATIONAL
LIMITED, et al.,

Defendants.

Case No. 24-cv-12589

Judge Manish S. Shah

Magistrate Judge M. David Weisman

**PLAINTIFF’S PRELIMINARY RESPONSE TO DEFENDANTS’
MOTION TO VACATE DEFAULT JUDGMENT**

Plaintiff BBC Studios Distribution Ltd. (“Plaintiff”) submits the following preliminary response to Defendants’ JHOMERIT’s (Defendant No. 58) and XIAsuix’s (Defendant No. 71) (collectively, “Defendants”) Motion to Vacate Default Judgment [62] (the “Motion”).

The Motion should be summarily denied since the Motion is not supported by law or facts. For example, the Motion asserts that Defendants “did not sell any infringing products to the state of Illinois.” [62] at p. 2. Contrary to this unsupported assertion, Plaintiff’s records show that purchases were made of infringing products for both Defendants that were delivered to Illinois.¹

If the Court is willing to consider the Motion, Plaintiff respectfully requests three weeks to respond.

¹ Plaintiff’s records show that the Order Nos. 20000125-93426996 and 2000125-48091192 of infringing products for Defendants have been shipped to Illinois and that the infringing products are currently in storage with Plaintiff’s investigators. *See* [18-2] at pp. 43, 92.

Dated this 14th day of February 2025.

Respectfully submitted,

/s/ Andrew Burnham

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CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of February 2025, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, I will electronically publish the documents on a website, and I will send an e-mail to the e-mail addresses identified in Exhibit A hereto that includes a link to said website.

/s/ Andrew Burnham
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